

**DANIEL KALISH, ESQ.**  
*Pro Hac Vice Pending* (WA Bar# 35815)  
E-mail: dkalish@hkm.com  
**MICHAEL ARATA, ESQ.**  
Nevada Bar No. 11902  
E-mail: marata@hkm.com  
**HKM EMPLOYMENT ATTORNEYS LLP**  
101 Convention Center Dr., Suite 600  
Las Vegas, Nevada 89109  
Tel: (702) 577-3029  
Fax: (702) 577-3029  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

11 NOAH MUIR, an Individual,  
12 Plaintiff,  
13 vs.  
14 CHAGAROOT, INC, a Nevada corporation;  
15 DOES I - X; ROE CORPORATIONS I - X.  
16 Defendants.

CASE NO.: 2:24-cv-1404

**MOTION TO CONTINUE DUE DATE  
FOR SUBMISSION OF PLAINTIFF'S  
COUNSEL'S VERIFIED PETITION AND  
DESIGNATION OF LOCAL COUNSEL**

**(First Request for Extension of Time)**

19 Plaintiff NOAH MUIR (“Noah” or “Plaintiff”), by and through his attorneys of record,  
20 the law firm of HKM Employment Attorneys LLP, hereby moves this Court to continue the due  
21 date for submission of Plaintiff’s lead counsel Daniel Kalish’s Verified Petition and  
22 Designation of Local Counsel to August 26, 2024.

23 On July 31, 2024, Plaintiff filed his Complaint against Defendant Chagaroot, Inc.,  
24 alleging the following causes of action: (1) Disability Discrimination in Violation of the  
25 Americans with Disabilities Act and Nevada State Law; (2) Retaliation under the Americans  
26 with Disabilities Act and Nevada State Law; (3) Breach of Contract; (4) Breach of Covenant of  
27 Good Faith and Fair Dealing; (5) Fraud – False Promise; and (6) Defamation. [ECF 1]. On  
28 August 1, 2024, this Court issued a Notice to Counsel Pursuant to Local Rule IA 11-2,

1 instructing Plaintiff's lead counsel, Daniel Kalish, to complete the Verified Petition and  
2 Designation of Local Counsel ("Verified Petition") and submit the Verified Petition by August  
3 15, 2024. [ECF 4].

4 Plaintiff's lead counsel, Dan Kalish, has been traveling outside of the country and is due  
5 to return later this month. As such, Mr. Kalish has been unable to complete the Verified Petition.  
6 Plaintiff therefore requests that this Court extend the due date for Mr. Kalish to submit the  
7 Verified Petition to August 26, 2024. Plaintiff contends that Plaintiff's counsel's submission of  
8 this motion one day past the due date is excusable under the circumstances due to lead counsel's  
9 presence out of the country and inability to submit the Verified Petition. As Defendant has not  
10 yet appeared in this case, there will be no resulting prejudice or undue delay caused by granting  
11 the requested extension.

12 As such, Plaintiff's counsel requests an extension of time, up to and including August  
13 26, 2024, to submit Mr. Kalish's Verified Petition and Designation of Local Counsel.

14 Dated this 16th day of August 2024.

15 **HKM EMPLOYMENT ATTORNEYS LLP**

16 */s/ Michael Arata*

17 **DANIEL KALISH, ESQ.**

18 *Pro Hac Vice Pending (WA Bar# 35815)*

19 E-mail: dkalish@hkm.com

20 **MICHAEL ARATA, ESQ.**

21 Nevada Bar No. 11902

22 E-mail: marata@hkm.com

23 **HKM EMPLOYMENT ATTORNEYS LLP**

24 101 Convention Center Dr., Suite 600

25 Las Vegas, Nevada 89109

26 Tel: (702) 577-3029

27 Fax: (702) 577-3029

28 *Attorneys for Plaintiff*

24 IT IS SO ORDERED.

25 Dated: August 19, 2024

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28 Nancy J. Koppe  
United States Magistrate Judge

1                   SUPPORTING DECLARATION OF MICHAEL ARATA  
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3                   I, Michael Arata, declare as follows:

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1. I am over the age of 18, and I am competent to testify about the matters stated herein.
2. I am an attorney with the law firm of HKM Employment Attorneys LLP (“HKM”), counsel of record for Plaintiff Noah Muir.
3. Upon information and belief, Plaintiff’s lead counsel Dan Kalish has been traveling outside of the country this month and has been unable to complete and submit his Verified Petition and Designation of Local Counsel (“Verified Petition”) by August 15, 2024.
4. Upon information and belief, Mr. Kalish is scheduled to return to the United States sometime next week.
5. I declare under the penalty of perjury under the laws of the United States and the State of Nevada that the foregoing is true and accurate.

Dated this 16<sup>th</sup> day of August 2024.

/s/ *Michael Arata*

Michael Arata